

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION

IN RE: REQUEST BY NARRAGANSETT :  
ELECTRIC TO INCREASE SOS RATE : Docket No. 3689

**MOTION OF THE GEORGE WILEY CENTER TO  
INTERVENE AS A FULL PARTY**

The George Wiley Center, by its attorney, moves under Rule 1.13 of the Rules of Practice and Procedure of the Public Utilities Commission to intervene as a full party in this action on the following grounds:

1. The George Wiley Center is a state-wide non-profit organization with headquarters in Pawtucket, Rhode Island.
2. The George Wiley Center's mission is to conduct community organizing and advocacy on behalf of all low-income Rhode Islanders.
3. The George Wiley Center has a long history of advocacy on behalf of low-income Rhode Islanders before the Public Utilities Commission.
4. The interests of the George Wiley Center are such that intervention is necessary and appropriate under PUC Rule 1.13(b). In particular, under PUC Rule 1.13(b)(2) and (3):
  - The interests of the low-income Rhode Islanders represented by the George Wiley Center may be directly affected by the rate increase requested by Narragansett Electric.
  - A rate increase will have a disproportionately onerous impact on low-income Rhode Islanders. Because any rate increase will weigh most heavily on low-income Rhode Islanders, this group of citizens is not

adequately represented by existing parties, who represent either broader, different or adverse interests before this Commission. It is therefore necessary and appropriate that low-income of Rhode Island citizens be independently represented by the George Wiley Center, which is the only state-wide organization of its type in Rhode Island.

- Participation by the George Wiley is in the public interest as a matter of justice, equity and fair play.

5. The George Wiley Center takes the position that the requested rate increase should be denied.

WHEREFORE, the George Wiley Center asks that its motion to intervene be granted.

Respectfully submitted,  
The George Wiley Center  
By its attorney,

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CERTIFICATE OF SERVICE

I certify that on the 17<sup>th</sup> day of August, 2005, I caused a copy of this document to be mailed to each of the following:

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